UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,) INDICTMENT
Plaintiff,) 21 U.S.C. § 843(a)(3)
v.) 21 U.S.C. § 843(d)(1)
LA VANG,)
Defendant.)

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Obtaining a Controlled Substance by Fraud)

On or about August 2, 2018, in the State and District of Minnesota, the defendant,

LA VANG,

knowingly and intentionally obtained and acquired hydrocodone, a controlled substance, by misrepresentation, fraud, deception, and subterfuge; that is, while acting as a home healthcare nurse for L.B. in Columbia Heights, Minnesota, responsible for placing L.B.'s medications into weekly medication planners, the defendant obtained and acquired hydrocodone intended for L.B. for his own use and benefit by covertly substituting similar-looking acetaminophen tablets in place of the hydrocodone tablets in the medication planners; all in violation of Title 21, United States Code, Sections 843(a)(3) and 843(d)(1).

A TRUE BILL

UNITED STATES ATTORNEY FOREPERSON

APR 0 1 2019